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January 19, 2006

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station, 2<sup>nd</sup> Floor  
Boston, Massachusetts 02110

Re: Southern Union Company, D.T.E. 06-2

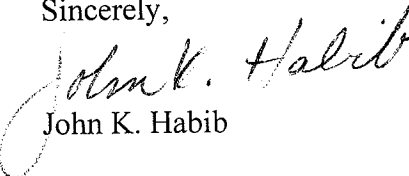
Dear Ms. Cottrell:

On behalf of Southern Union Company (the "Company"), please find enclosed the Company's responses to information requests issued by the Department of Telecommunications and Energy (the "Department") as referenced on the attached page. In addition, the Company is filing herewith a Motion for Protective Treatment of Confidential Information relating to Attachment DTE-1-05(a) **CONFIDENTIAL**. The document contains competitively sensitive information and is being filed under separate cover with the Hearing Officer only.

Please note that the principal Company officials that are responsible for responding to the Department's information requests are heavily involved in the non-regulatory aspects of the Sid Richardson transaction. Therefore, a number of the responses are not yet available. However, the Company is endeavoring to respond to the remainder of the Department's information requests tomorrow morning.

Please do not hesitate to contact me or Cheryl Kimball if we can provide you with any additional information concerning this matter.

Sincerely,

  
John K. Habib

Enclosures

cc: Andrew O. Kaplan, General Counsel  
Jesse Reyes, Hearing Officer  
Kevin Brannelly, Director, Rates and Revenue Requirements Division

D.T.E. 06-2 Responses to Discovery

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George Yiankos, Director, Gas Division

Paul E. Osborne, Assistant Director, Rates & Revenue Requirements Division

Joseph Passaggio, Rates & Revenue Requirements

Glenn Shippee, Rates & Revenue Requirements

Joseph W. Rogers, Assistant Attorney General

## **RESPONSES TO INFORMATION REQUESTS**

DTE-1-01

DTE-1-02

DTE-1-03

DTE-1-04

DTE-1-05

DTE-1-08

DTE-1-12

DTE-1-14

DTE-1-16